Before the
Federal Communications Commission
Washington, D.C. 20554

In the Matters of	)	
	)	
IP-Enabled Services	)	WC Docket No. 04-36
	)	
E911 Requirements for IP-Enabled Service Providers	)	WC Docket No. 05-196

PRT LARGA DISTANCIA, INC.
COMPLIANCE LETTER UPDATE

On November 28, 2005, PRT Larga Distancia, Inc. (hereinafter "PRTLD"), filed a *Compliance Letter* in the present proceeding, according to the Commission's June 3, 2005 Order (VoIP 911 Order), establishing E-911 requirements for IP-enabled service providers.

As PRTLD has informed to the Commission on prior reports[1], it provides an interconnected VoIP service called PhoneMax on the Island of Puerto Rico. PhoneMax customers who travel to the U.S. may also use their PhoneMax service. However, PRTLD sells and markets its PhoneMax service exclusively to customers in Puerto Rico.

In a November 7, 2005, *Public Notice*, the Commission's Enforcement Bureau applauded the steps undertaken by AT&T, MCI and Verizon with respect to their plans to implement an automatic detection mechanism that

[1] Subscriber Notification and Acknowledgements Reports dated August 10, 2005; September 1, 2005; September 22, 2005, October 25, 2005, and Compliance Letter dated November 28, 2005.

enables the provider to identify when a customer may have moved his or her interconnected VoIP service to a new location and ensured that the customer continued to receive 911 service even when using the interconnected VoIP service nomadically. With respect to the aforementioned automatic detection 911 compliance plans, the Enforcement Bureau encouraged other interconnected VoIP providers to adopt similar measures, and to include in their November 28, 2005 Compliance Letters a detailed statement as to whether and how they had implemented such measures. To the extent that providers had not implemented similar measures, they had to describe the measures they had implemented to comply with the requirements of the VoIP 911 Order.

PRTLD informed the Commission that it was in the process of developing an automatic detection 911 compliance plan for nomadic customers traveling within Puerto Rico or to the US. The plan consisted of the following: The PhoneMax service would automatically detect when a customer may have moved from his or her previous location and would restrict the service until the customer accessed the WEB interface and updated his or her location information. Once the location information had been updated, the system would restore the PhoneMax service. While in a restricted mode, the customer would only be allowed to receive incoming calls, dial 911 and access the Help Desk via the 800 number. Whenever a customer tried to use the PhoneMax service, calls would be redirected to a

recorded message which would inform the customer why the service had been restricted and how to update the location information.

PRTLD hereby informs the Commission that, for almost a year, it has been trying to implement the aforementioned solution, with no results. The steps taken by PRTLD towards the implementation of the automatic detection mechanism were the following:

- PRTLD contacted Nortel over the possibility of using a SIP protocol to implement the automatic detection mechanism, utilizing the IP address information, which would interact with a database application created by a company named Atlasbit.

- Since it was necessary to install a server to manage the customer address registration SIP messages, PRTLD contracted with a company called Counterpath in order for it to work with Atlasbit in the development of the solution.

- Counterpath provided the basic modules used to implement a SIP server, and worked with Atlasbit for various months.

- Counterpath referred PRTLD to a company named Estacado, due to lack of technical personnel, which prevented Counterpath to dedicate the time and effort needed to implement the solution. Estacado had the adequate technical personnel and had knowledge of the Counterpath solution.

- PRTLD contracted Estacado to provide consulting services in order to determine why the solution provided by Counterpath, and the application developed by Atlasbit did not work. After various weeks of work, Estacado provided PRTLD a report which showed the reasons for the incompatibility between the Counterpath solution and Atlasbit application, as well as a list of recommendations to resolve the situation.

- PRTLD worked with Atlasbit and made the necessary changes, as recommended by Estacado, making the application work.

- Part of the tests performed by Atlasbits to finalize the implementation of the solution, revealed that the VoIP Nortel server was sending to the

SIP server more than one IP address (both public and private addresses) in the same message.

- Given this situation, PRTLD contacted Nortel's technical personnel requesting support for Atlasbit in fixing this problem. PRTLD tried to obtain information on multiple occasions from Nortel, without being able to obtain a response.

- At the moment, and not withstanding all efforts made by PRTLD to implement a automatic detection mechanism, the company has not been able to develop an appropriate solution.

PRTLD respectfully requests that the Commission be informed of the above for all pertinent purposes.

Respectfully submitted, this 31st day of January, 2007.

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By: (signed)

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